STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE:	
OFFICE OF CONSUMER ADVOCATE,	
Petitioner,	
v.	DOCKET NO. FCU-2016-0011
INTERSTATE POWER AND LIGHT,	
Respondent.	

RESPONSE TO MOTION TO MODIFY PROCEDURAL SCHEDULE AND OCA REQUEST FOR IPL TO MAKE WITNESSES AVAILABLE AT HEARING

COMES NOW the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, and for its Response to Interstate Power and Light's (IPL) Motion and OCA's Request for Witness Availability at Hearing does hereby state:

1.   On October 26, 2016, IPL filed a Motion to Modify Procedural Schedule. OCA does not resist IPL's Motion.

2.   On October 25, 2016, the Iowa Utilities Board (Board) issued an Order Establishing Formal Complaint Proceedings. OCA is to file prepared testimony on or before November 11, 2016, and be prepared for hearing scheduled on December 5, 2016.

3.   This proceeding raises a number of issues where the facts are primarily in the control of IPL. OCA has just over two weeks for discovery and the filing of prepared testimony. OCA anticipates that additional information from IPL will be needed for a thorough investigation and complete record.

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4.   OCA will abide by the schedule determined by the Board but asks that the Board require IPL to have those individuals who are indicated by IPL as authors of the responses to data requests served by OCA available as witnesses subject to cross-examination at the hearing. 199 IAC 7.16.

WHEREFORE, OCA respectfully informs the Board it will not resist IPL's Motion and requests that the Board order IPL to have those individuals who are indicated by IPL as authors of the responses to data requests served by OCA available as witnesses subject to cross-examination at the hearing.

Respectfully submitted,

/s/ Mark R. Schuling
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OFFICE OF CONSUMER ADVOCATE

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